EXHIBIT A

Page 1

1   UNITED STATES DISTRICT COURT

2   NORTHERN DISTRICT OF OHIO

3   EASTERN DIVISION

4

5   _____

)

6   JAMES HAYDEN,   )

)

7   Plaintiff,   )

)

8   vs.   )   No. 1:17-CV-02635-CAB

)

9   2K GAMES INC. and TAKE-TWO   )

    INTERACTIVE SOFTWARE, INC.,   )

10   )

)

             Defendants.   )

11   )

_____)

12

13   HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

14   SUBJECT TO THE PROTECTIVE ORDER

15   30(b)(6) and 30(b)(1) DEPOSITION OF JEFFREY THOMAS

16   San Francisco, California

17   Friday, January 24, 2020

18   Volume I

19

20

21   Reported by:

     CATHERINE A. RYAN, RMR, CRR

22   CSR No. 8239

23   Job No. 3838292

24

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1   Q   But you do not track the frequency with which

2   users of the accused games play with a particular NBA

3   player, such as LeBron James; is that right?

4   A   Yes, we do not track that.

5   Q   You release the games for different consoles,

6   such as Xbox, PlayStation.

7   Any others?

8   A   (Witness nods head.)

9   Q   Which other console?

10   A   PC Switch.

11   Q   With respect to the features that ultimately

12 make it into the game when it's launched, will it be the

13 same for all consoles?

14   MS. CENDALI: Objection. Overbroad.

15   You can answer. Outside the scope.

16   THE WITNESS: No, not necessarily. The

17 machines have different power and different

18 capabilities. So there may be things removed, for

19 example, for a lesser-powered machine.

20 BY MS. YANCHAR:

21   Q   And will there generally be less features in

22 NBA 2K Mobile?

23   A   Generally, yes.

24   (Exhibit 45 was marked for identification.)

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